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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	NO. 03-CR-348 (WHA)
	)	
Plaintiff / Respondent,	)	<b>UNITED STATES' MOTION TO SEAL AND</b>
	)	<b>[PROPOSED] ORDER</b>
v.	)	
	)	
	)	
WEI ZHU,	)	
	)	
Defendant / Petitioner.	)	
	)	

UNITED STATES' MOTION TO SEAL  
NO. 03-CR-348 (WHA)

In connection with the United States' opposition to Wei Zhu's *coram nobis* petition, the United States requests leave to file several exhibits under seal because they were ordered to be filed under seal at an earlier stage of this case. *See* ECF No. 41 ("ORDER by Judge William H. Alsup sealing as to defendant Wei Zhu") (dated September 20, 2004). Accordingly, the United States hereby requests leave to file Exhibits A-E, as well as Exhibits G-H, under seal, with the exception that the Defendant/Petitioner and his counsel may receive copies of such documents.

Respectfully submitted,

DATED: December 18, 2015

BRIAN J. STRETCH  
Acting United States Attorney


/s/  
JEROME MAYER-CANTÚ  
Assistant United States Attorney

**[PROPOSED] ORDER**

Upon the motion of the United States, and good cause appearing, IT IS HEREBY ORDERED THAT the Clerk of the Court file the Exhibits A-E, as well as Exhibits G-H, to the United States' Opposition in the above-captioned case under seal, except that copies may be provided to the Defendant/Petitioner and his counsel, and maintain the documents under seal until further notice from this Court.

IT IS SO ORDERED.

Dated: December 21, 2015.

  
HON. WILLIAM ALSUP  
United States District Court Judge